

**From:** [ANDERSON Jim M](#)  
**To:** [Eric Blischke/R10/USEPA/US@EPA](#); [pbattuello@parametrix.com](#); [lbernardini@parametrix.com](#); [Curt Black/R10/USEPA/US@EPA](#); [jeremy\\_buck@fw.gov](#); [Ben Cope/R10/USEPA/US@EPA](#); [cunninghame@gorge.net](#); [Dana Davoli/R10/USEPA/US@EPA](#); [tomd@ctsi.nsn.us](#); [Rene Fuentes/R10/USEPA/US@EPA](#); [GAINER Tom](#); [rgensemer@parametrix.com](#); [Joe Goulet/R10/USEPA/US@EPA](#); [Gina Grepo-Grove/R10/USEPA/US@EPA](#); [audiehuber@ctuir.com](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Kristine Koch/R10/USEPA/US@EPA](#); [rose@yakama.com](#); [erin.madden@gmail.com](#); [Robert.Neely@noaa.gov](#); [Sean Sheldrake/R10/USEPA/US@EPA](#); [Burt Shephard/R10/USEPA/US@EPA](#); [PETERSON Jenn L](#); [POULSEN Mike](#); [jay.field@noaa.gov](#); [MCCLINCY Matt](#); [Lori Cora/R10/USEPA/US@EPA](#); [Mark Ader/R10/USEPA/US@EPA](#); [Benjamin Shorr](#); [csmith@parametrix.com](#); [sheila@ridolfi.com](#); [LavelleJM@cdm.com](#); [Mary.Baker@noaa.gov](#); [Michael.Karnosh@grandronde.org](#); [Judy Smith/R10/USEPA/US@EPA](#); [FARRER David G](#); [dallen@stratusconsulting.com](#); [jpeers@stratusconsulting.com](#);  
(b) (6) [nancy.munn@noaa.gov](#)  
**Cc:** [SCHWARZ Bob](#); [TARNOW Karen E](#); [JOHNSON Keith](#)  
**Subject:** Draft Source Control Decision for Anderson Brothers  
**Date:** 07/15/2009 01:32 PM

---

At our 6/17/09 TCT meeting, I advised you that DEQ would soon submit our draft Source Control Decision (SCD) for the Anderson Brothers site to EPA for review & comment. We will submit that draft SCD to EPA today, Wed 7/15/09. DEQ's SCD is that the site has been adequately characterized & sources of contamination at the site have been eliminated or controlled, & the site is therefore a low priority for additional evaluation or source control measures. A summary of the decision is provided below.

Anderson Brothers was issued a DEQ partial No Further Action (NFA) decision on 2/5/07 after it was determined that residual contaminant levels in soils & groundwater throughout the site were below acceptable risk levels for upland receptors. It was a partial NFA because additional sampling & source control measures were needed to address the stormwater pathway...., the only contaminant migration pathway potentially threatening the river. The stormwater pathway is the focus of this SCD document.

The 4.8-acre facility on NW St. Helens Road, abuts Forest Park, & is about 2000 feet from the Willamette River. It is within the City's Outfall 19 drainage basin & is a very minor contributor to the volume of stormwater discharged at this outfall. The current owner acquired the property in 2007 & operates a hardwood storage & sales operation & custom hardwood preparation operation at the site. Former site uses included trucking, millwright, equipment storage & automotive repair operations. Work leading up to the 2007 NFA included removal of 68 tons of petroleum-contaminated soil from the area near a former fuel dispenser island. During the stormwater evaluation, sediments from the catch basins & stormwater lines were removed after sampling results showed elevated concentrations of various metals, phthalates & polycyclic aromatic hydrocarbons (PAHs). These actions eliminated the potential for legacy contaminants to contaminate stormwater. After the stormwater system cleanout & implementation of various stormwater best management practices (BMPs), stormwater samples showed relatively minor exceedances of several contaminant screening level values (SLVs), all of which were below the concentrations found in stormwater samples collected from Outfall 19 by the LWG. Based upon these findings & dependent on the continued implementation of BMPs, DEQ concluded that the stormwater discharges from this site are not likely to result in significant impacts in the river & that no additional stormwater evaluation or source control measures are needed at this time.

Please contact me if you are interested in reviewing DEQ's draft SCD memo or the supporting project file. Comments are due in 30 days, August 17, 2009.

Jim Anderson

Manager, DEQ Portland Harbor Section

ph: 503.229.6825

fax: 503.229.6899

cell: 971.563.1434